## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:

\$ CASE NO. 15-35615

RAAM GLOBAL ENERGY COMPANY, \$ (Chapter 11)

\$ JOINTLY ADMINISTERED

DEBTORS.

## SECOND AMENDMENT TO PLAN SUPPLEMENT FOR DEBTORS' SECOND AMENDED JOINT PLAN OF LIQUIDATION PURSUANT TO CHAPTER 11 OF THE BANKRUPTCY CODE

The above-referenced debtors and debtors in possession (the "Debtors") hereby file this Second Amendment to Plan Supplement for Debtors' Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code (the "Second Amendment to Plan Supplement") pursuant to Section 14.13 of the Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code (as amended, modified, and supplemented, the "Plan"). This Second Amendment to Plan Supplement supplements the form of Liquidating Trust Agreement, attached as Exhibit C to the Plan Supplement for Debtors' Second Amended Joint Plan of Liquidation Pursuant to Chapter 11 of the Bankruptcy Code [Docket No. 299] (the "Plan Supplement") by replacing such form of Liquidating Trust Agreement with the Liquidating Trust Agreement attached as Exhibit 1 thereto. A redline showing changes to the Liquidating Trust Agreement is attached hereto as Exhibit 2. This Second Amendment to Plan Supplement further provides notice that the initial members of the Liquidating Trust Committee are Greg White, Jeff Fitts,

<sup>&</sup>lt;sup>1</sup> Capitalized terms that are not defined herein have the meaning set forth in the Plan or the Liquidating Trust Agreement, as applicable.

and Monty Kehl and the initial members of the Litigation Committee are Greg White and Jeff Fitts.

The Debtors reserve all rights to further amend, modify, or supplement the Plan Supplement and any of the documents contained therein, in accordance with the terms of the Plan.

Dated: January 15, 2016

Respectfully submitted,

## VINSON & ELKINS LLP

By: /s/ Reese A. O'Connor

Harry A. Perrin, SBT # 1579800 John E. West, SBT # 21202500 Reese A. O'Connor, SBT # 24092910 First City Tower 1001 Fannin Street, Suite 2500 Houston, TX 77002-6760

Tel: 713.758.2222 Fax: 713.758.2346

hperrin@velaw.com; jwest@velaw.com

roconnor@velaw.com

and

William L. Wallander, SBT # 20780750 Bradley R. Foxman, SBT # 24065243 Trammell Crow Center 2001 Ross Avenue, Suite 3700 Dallas, TX 75201

Tel: 214.220.7700 Fax: 214.999.7787

bwallander@velaw.com; bfoxman@velaw.com

## ATTORNEYS FOR THE DEBTORS